

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

SEP 27 2018

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRACEY PITRE and
KRYSTAL PITRE

Defendants.

4:18CR802 HEA/PLC

INDICTMENT

COUNT I (CONSPIRACY – THEFT OF MAIL)

The Grand Jury charges that:

Introduction

1. Between on or about January 1, 2018 and continuing through on or about July 1, 2018, with the exact dates unknown (the “relevant time period”), Defendant Tracey Pitre was a mail handler assigned to the Hazelwood Network Distribution Center in Hazelwood, Missouri which lies within the Eastern District of Missouri.
2. During the relevant time period, Defendant Krystal Pitre, the daughter of Defendant Tracey Pitre was also a postal employee assigned to the Hazelwood Network Distribution Center.
3. At the Hazelwood Network Distribution Center, there were areas in which “loose mail” and “dead mail” were kept. These terms refer to parcels or items from within mail parcels that have been separated. The items in these areas constitute articles contained within U.S. Mail as that term is defined in Title 18, United States Code Section 1709.

It is the intent to the U.S. Postal Service to identify “loose mail” and “dead mail” and deliver it to the rightful addressee.

The Conspiracy

4. It was an object of the conspiracy for Defendant Tracey Pitre to steal articles from the “dead mail” and “loose mail” areas of her place of employment and deliver those items to her residence or to the residence of Defendant Krystal Pitre. Defendant Tracey Pitre utilized “G-10” parcels to send the stolen articles to her residence and that of Defendant Krystal Pitre free of postage charges.
5. It was an object of the conspiracy for Defendant Tracey Pitre and Defendant Krystal Pitre to take the stolen articles for their personal use or for the use of their family members.
6. It was an object of the conspiracy for Defendant Tracey Pitre to sell some of the stolen articles to third parties and keep the proceeds for her own benefit.
7. In all, during the relevant time period, Defendant Tracey Pitre directed approximately twenty parcels of stolen articles to her residence and the residence of Defendant Krystal Pitre.

Offense Conduct

8. Between on or about January 1, 2018 and continuing through on or about July 1, 2018, with the exact dates unknown, in the Eastern District of Missouri, the Defendants,

**TRACEY PITRE and
KRYSTAL PITRE,**

did agree to commit an offense against the United States, to wit: theft of mail by a postal employee in violation of Title 18, United States Code Section 1709 and 2, and did knowingly and voluntarily join such agreement knowing its purpose and, during the

existence of said agreement, one or more overt acts in furtherance of the same were committed by a party to the agreement.

All in violation of Title 18, United States Code Section 371.

COUNT II – THEFT OF MAIL

9. The allegations contained in Count I are hereby realleged and incorporated by reference.

10. Between on or about January 1, 2018 and continuing through on or about July 1, 2018, the Defendant,

TRACEY PITRE,

did, while an employee or officer of the Postal Service, knowingly steal a letter, postal card, package, bag, mail or any article or thing entrusted to her or which came into her possession intended to be conveyed by the mail.

In violation of Title 18, United States Code Section 1709 and 2.

COUNT III – OBSTRUCTION OF THE MAILS

11. The allegations contained in Count I are hereby realleged and incorporated by reference.

12. Between on or about January 1, 2018 and continuing through on or about July 1, 2018, the Defendants,

**TRACEY PITRE and
KRYSTAL PITRE,**

did willfully and knowingly obstruct and retard the passage of the U.S. Mail.

In violation of Title 18, United States Code Section 1701.

A TRUE BILL

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

Thomas C. Albus, #96250
Assistant United States Attorney